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6 Attorneys for Defendant  
WELLS FARGO BANK, N.A.

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11 DAVID IVERSEN, on behalf of  
12 themselves individually, and all others  
similarly situated,

13 Plaintiff,

14 || vs.

15 WELLS FARGO BANK, N.A., and DOES  
1 through 10, INCLUSIVE,

Defendant(s).

CASE NO. CV-10-5566-LB

**STIPULATION AND [PROPOSED]  
ORDER OF DISMISSAL WITH  
PREJUDICE**

Judge: The Honorable Laurel Beeler

WHEREAS, the parties have reached an agreement that calls for the dismissal with prejudice of this action, with each side to bear their own attorneys' fees and costs;

WHEREAS, the parties agree that the dismissal with prejudice of this action would preclude Plaintiff from bringing any future claims related to his employment with Defendant, including without limitation any claims under the California Labor Code or the Federal Fair Labor Standards Act; and

WHEREAS, entry of this dismissal order would approve and finalize the associated effect;

NOW, THEREFORE, IT IS HEREBY STIPULATED<sup>1</sup> THAT this action is dismissed in its entirety and with prejudice to the individual claims of Plaintiff Iversen.

Munger, Tolles & Olson LLP

DATED: March 12, 2012

By: /s/ Malcolm A. Heinicke  
MALCOLM A. HEINICKE

Attorneys for Defendant  
**WELLS FARGO BANK, N.A.**

## Hoffman Employment Lawyers

DATED: March 12, 2012

By: /s/ Michael Hoffman  
MICHAEL HOFFMAN

Attorney for Plaintiff  
**DAVID IVERSEN**

Pursuant to stipulation, IT IS SO ORDERED. This action is hereby dismissed in its entirety, and such dismissal shall be with prejudice to the individual claims of Plaintiff Iversen.

The Honorable *Bruce E. Beeler*  
UNITED STATES MAGISTRATE JUDGE

<sup>1</sup> I, Michael Hoffman, am the ECF User whose identification and password are being used to file this Stipulation and [Proposed] Order of Dismissal with Prejudice. In compliance with General Order 45.X.B., I hereby attest that Malcolm A. Heinicke concurred in this filing.